Ian G. DiBernardo
Timothy K. Gilman
Kenneth L. Stein
Saunak K. Desai
Gregory R. Springsted
Stroock & Stroock & Lavan LLP
180 Maiden Lane
New York, NY 10038
Tel: (212) 806-5400
Fax: (212) 806-6006
Email: idibernardo@stroock.com

Email: idibernardo@stroock.com Email: tgilman@stroock.com Email: kstein@stroock.com Email: sdesai@stroock.com Email: gspringsted@stroock.com

Attorneys for Plaintiff Kewazinga Corp.

IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

KEWAZINGA CORP.,)
Plaintiff,) Civil Action No. 1:20-cv-01106-LGS
vs.)
GOOGLE LLC,)
Defendant.)

PLAINTIFF KEWAZINGA CORP.'S NOTICE OF CROSS-MOTION FOR SUMMARY JUDGMENT OF NO EQUITABLE ESTOPPEL

PLEASE TAKE NOTICE that, upon all the materials listed below, and all prior pleadings and proceedings had herein, the undersigned attorneys for Plaintiff Kewazinga Corp. will move this Court, before the Honorable Lorna G. Schofield, United States District Court Judge, 40 Foley Square, New York, New York 10007, pursuant to the Court's order regarding motions for summary judgment related to equitable estoppel (Dkt. No. 49), for entry of an order granting summary judgment in favor of Kewazinga of no equitable estoppel.

PLEASE TAKE FURTHER NOTICE that, in support of this motion, Kewazinga shall rely upon the accompanying Memorandum of Law, Local Rule 56.1 Statement of Undisputed Material Facts, Opposition to Google's Local Rule 56.1 Statement of Undisputed Material Facts, and Declaration of Saunak K. Desai with exhibits.

Dated: New York, New York July 29, 2020 Respectfully submitted,

/s/ Ian G. DiBernardo

Ian G. DiBernardo Timothy K. Gilman Kenneth L. Stein Saunak K. Desai Gregory R. Springsted

Stroock & Stroock & Lavan LLP

180 Maiden Lane

New York, N.Y. 10038

Tel: (212) 806-5400

Fax: (212) 806-6006

Email: idibernardo@stroock.com Email: tgilman@stroock.com Email: kstein@stroock.com Email: sdesai@stroock.com

Email: gspringsted@stroock.com

Attorneys for Plaintiff Kewazinga Corp.

CERTIFICATE OF SERVICE

I hereby certify that on July 29, 2020, I caused a true and correct copy of the foregoing **PLAINTIFF KEWAZINGA CORP.'S NOTICE OF CROSS-MOTION FOR SUMMARY JUDGMENT OF NO EQUITABLE ESTOPPEL** to be filed and served electronically by means of the Court's CM/ECF system in accordance with Federal Rules of Civil Procedure and/or the Local Rules of this Court, upon the following counsel of record:

John Michael Desmarais Elizabeth Esther Weyl Steven Marc Balcof David A. Frey DESMARAIS LLP 230 Park Avenue New York, NY 10169 Tel: (212)-351-3400

Tel: (212)-351-3400 Fax: (212)-351-3401

Email: jdesmarais@desmaraisllp.com

Email: eweyl@dllp.com Email: sbalcof@dllp.com

Email: dfrey@desmaraisllp.com

Ameet A. Modi Emily Chen (*Pro Hac Vice*) DESMARAIS LLP 101 California St. San Francisco, CA 94111 Tel: (415) 573–1806

Email: amodi@desmaraisllp.com Email: echen@desmaraisllp.com

Attorneys for Defendant Google LLC

/s/ Saunak K. Desai

Saunak K. Desai